

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(COLUMBIA DIVISION)

THE SOUTH CAROLINA STATE
CONFERENCE OF THE NAACP,

and

TAIWAN SCOTT, on behalf of himself and all
other similarly situated persons,

Plaintiffs,

v.

HENRY D. MCMASTER, in his official capacity
as Governor of South Carolina;
HARVEY PEELER, in his official capacity as
President of the Senate; LUKE A. RANKIN, in his
official capacity as Chairman of the Senate
Judiciary Committee; JAMES H. LUCAS, in his
official capacity as Chairman of the House of
Representatives; CHRIS MURPHY, in his official
capacity as Chairman of the House of
Representatives Judiciary Committee; WALLACE
H. JORDAN, in his official capacity as Chairman
of the House of Representatives Elections Law
Subcommittee; HOWARD KNABB, in his official
capacity as interim Executive Director of the South
Carolina State Election Commission; JOHN
WELLS, JOANNA DAY, CLIFFORD J. ELDER,
LINDA MCCALL, and SCOTT MOSELEY, in
their official capacities as members of the South
Carolina State Election Commission,

Defendants.

Case No: 3:21-cv-03302-JMC

**Application/Affidavit for
Pro Hac Vice Admission**

- (1) Name. Adriel I. Cepeda Derieux
- (2) Residence. I reside in the following state: New York
If a South Carolina resident, indicate months/years of residence:
- (3) Business Address. I am an attorney and practice law under the name of or as a member of the
following firm:

Firm name: American Civil Liberties Union Foundation, Inc.

Mailing address: 125 Broad Street, 18th Floor
 Telephone number: (212) 549-2500
 Facsimile number: N/A
 E-mail address: acepedaderieux@aclu.org

City/State/Zip: New York, NY 10004

(Application will not be considered without an e-mail address to receive electronic notification.)

- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹
- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of New York where I regularly practice law. **Attached is my certificate of good standing.**
- (6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court (see attached)	Date Admitted	Good Standing	
_____	_____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
_____	_____	<input type="checkbox"/> Yes	<input type="checkbox"/> No
_____	_____	<input type="checkbox"/> Yes	<input type="checkbox"/> No

- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? ☐ Yes ☒ No
 (If “yes,” give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

- (8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
☐ Yes ☒ No
 (If “yes,” give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?

¹This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

☐ Yes ☒ No

(If “yes,” give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?

☐ Yes ☒ No

(If “yes,” give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

☐ Yes ☐ No

(If “yes,” give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Attorney Name: Christopher J. Bryant, Fed. ID 12538
 Firm Name: Boroughs Bryant, LLC
 Street Address or Post Office Box: 1122 Lady St., Ste. 208
 City, State, and Zip Code: Columbia, SC 29201
 Telephone Number: (843) 779-5444
 E-Mail Address: chris@boroughsbryant.com

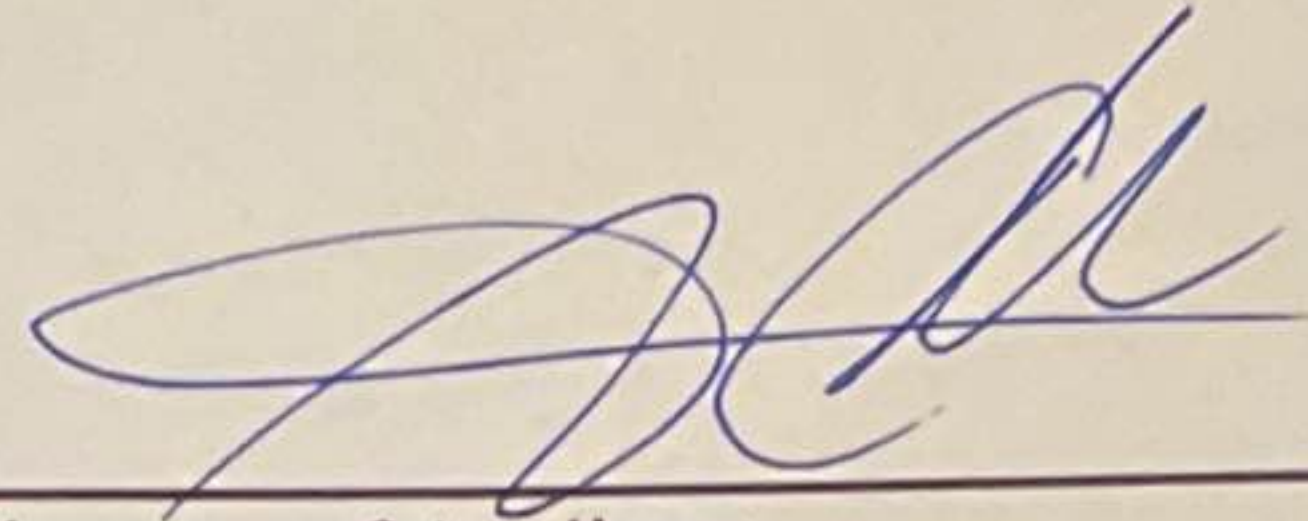
I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.
 (see attached)
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- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

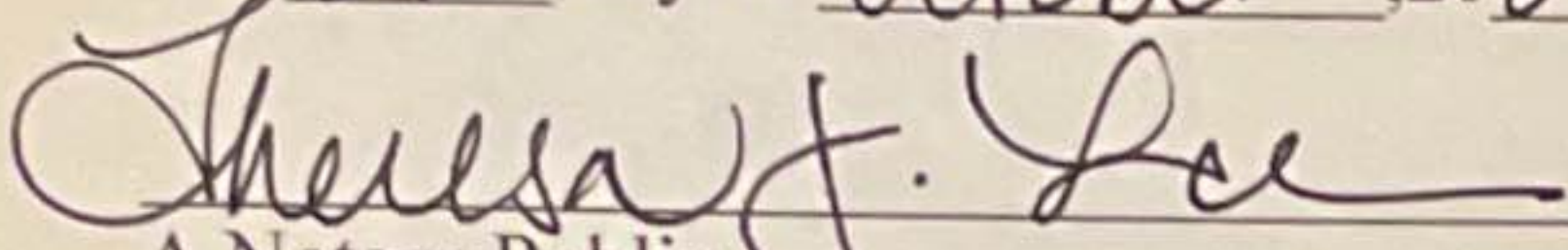
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:
The South Carolina State Conference of the NAACP and Taiwan Scott, on behalf of himself and all other similarly situated persons.
- (17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.



Signature of Applicant

Sworn to and subscribed before me
this 27th day of October, 2021.



A Notary Public
of the State of New York

My Commission expires: 12/23/21



Adriel I. Cepeda Derieux Additional Bar Admissions

Court	Date Admitted	Good Standing
U.S. Supreme Court	May 19, 2014	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Court of Appeals for the 1st Cir.	Mar. 15, 2016	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Court of Appeals for the 2nd Cir.	Mar. 17, 2016	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Court of Appeals for the 3rd Cir. U.S.	Mar. 25 2016	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Court of Appeals for the 4th Cir.	May 19, 2020	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Court of Appeals for the 7th Cir. U.S.	Mar. 24, 2017	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Court of Appeals for the 9th Cir.	May 22, 2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. Court of Appeals for the 10th Cir.	May 12, 2020	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Federal Circuit	June 9, 2011	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Eastern District of New York	June 2, 2014	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Southern District of New York	May 20, 2014	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
D.C. Circuit	May 16, 2016	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Associated Counsel

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*Pro Hac Vice Application Forthcoming



*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Adriel I. Cepeda Derieux

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on April 6, 2011, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

*In Witness Whereof, I have hereunto set
my hand in the City of New York on
October 26, 2021.*



A handwritten signature in black ink that reads "Susanna M. Rojas".

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

ROLANDO T. ACOSTA
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas
Clerk of the Court

Revised October 2020